

# **Exhibit A**

This Exhibit is offered in support of Defendants' Memorandum of Law in Opposition to Plaintiffs' Motion To File a Consolidated Amended Pleading of Facts and Evidence as to the Kingdom of Saudi Arabia and the Saudi High Commission for Relief of Bosnia and Herzegovina. For the reasons set forth in that Memorandum, it is Defendants' position that Plaintiffs' Proposed Amended Pleading, Dkt. No. 2890-2 ("Pleading") is wholly insufficient to establish jurisdiction over Defendants. This Exhibit sets forth a further detailed showing that 416 of the paragraphs in the Pleading a) contain allegations that Plaintiffs could have made prior to January 1, 2005; b) do not contain factual information; c) summarize preceding or succeeding allegations; or d) duplicate earlier paragraphs.

In setting forth the sources cited below, Defendants do not concede that any of the alleged facts are true; that the cited sources provide any evidentiary support for any of the alleged facts; that any of the alleged facts are properly pleaded; or that the alleged facts are legally material to Plaintiffs' claims. Defendants' purpose is only to show that, in 2004 or earlier, Plaintiffs could, through reasonably diligent effort, have found publicly available sources that (whether correctly or incorrectly) make statements that match or closely resemble a large majority of the same allegations they seek to make now.

¶¶	Source/Description
1-3	Non-factual allegations.
4	First Amended Complaint ¶ 63, <i>Federal Insurance v. Al Qaida</i> , Case No. 03-CV-6978 (S.D.N.Y. filed Mar. 10, 2004) (" <i>Federal Insurance v. Al Qaida</i> , First Amended Complaint").
5	Decl. of Mutlib bin Abdullah Al-Nafissa ¶ 3 (dated Jan. 31, 2004) (filed as 03-MDL-1570 Dkt. No. 262, Exh. C, June 25, 2004).
6-7	Non-factual allegations.
8-9	<i>Federal Insurance v. Al Qaida</i> , First Amended Complaint ¶¶ 70-71.
10	<i>See, e.g.</i> , National Commission on Terrorist Attacks Upon the United States, <i>The 9/11 Commission Report</i> at 46, 47, 59 (2004) (" <i>9/11 Commission Report</i> ").
11-14	Summary allegations.
15-16	<i>Federal Insurance v. Al Qaida</i> , First Amended Complaint ¶¶ 75-76.
17	<i>9/11 Commission Report</i> at 55.
18-20	<i>Federal Insurance v. Al Qaida</i> , First Amended Complaint ¶¶ 75-76.
21	<i>9/11 Commission Report</i> at 56.
22	<i>See, e.g.</i> , <i>9/11 Commission Report</i> at 50-51, 58-59.
23	<i>See, e.g.</i> , Congressional Research Service, <i>Al Qaeda: Statements and Evolving Ideology</i> at 6 (Nov. 16, 2004); Phillip Carter, FindLaw, <i>Al Qaeda and the Advent of Multinational Terrorism: Why 'Material Support' Prosecutions Are Key in the War on Terrorism</i> (Mar. 12, 2003), <a href="http://writ.news.findlaw.com/student/20030312_carter.html">http://writ.news.findlaw.com/student/20030312_carter.html</a> .

¶¶	Source/Description
24	<i>See, e.g., 9/11 Commission Report</i> at 59, 61, 66-67, 125, 250; Phillip Carter, FindLaw, <i>Al Qaeda and the Advent of Multinational Terrorism: Why 'Material Support' Prosecutions Are Key in the War on Terrorism</i> (Mar. 12, 2003), <a href="http://writ.news.findlaw.com/student/20030312_carter.html">http://writ.news.findlaw.com/student/20030312_carter.html</a> .
25	Indictment ¶ 4, <i>U.S. v. Moussaoui</i> , Case No. 01-CR-455 (E.D. Va. filed Dec. 11, 2001).
26	<i>See, e.g., 9/11 Commission Report</i> at 59-61.
27	<i>See, e.g., 9/11 Commission Report</i> at 50-51, 58-59, 191.
28-29	Department of Defense Intelligence Report at 3-4 (Oct. 16, 1998), <a href="http://stagenc.judicialwatch.org/wp-content/uploads/2013/07/C_102_dia.pdf">http://stagenc.judicialwatch.org/wp-content/uploads/2013/07/C_102_dia.pdf</a> (Declassified Nov. 16, 2004).
30	<i>See, e.g., 9/11 Commission Report</i> at 58-59, 191.
31-34	<i>9/11 Commission Report</i> at 55, 172-73, 365-66.
36	Decl. of Kenneth R. McKune ¶ 8 (dated Apr. 21, 1998), <i>Humanitarian Law Project v. Reno</i> , Case No. 98-1971 (C.D. Cal. filed Feb. 9, 2006). <sup>1</sup>
37	<i>See, e.g., 9/11 Commission Report</i> at 169-72.
38	Jodi Vittori, <i>The Business of Terror: Al Qaeda as Multi-National Corporation</i> at 13-14 (Sept. 2004); <i>9/11 Commission Report</i> at 169-70.
39	<i>Federal Insurance v. Al Qaida</i> , First Amended Complaint ¶ 78.
40	UN Security Council, <i>Second Report of the Monitoring Group Established Pursuant to Resolution 1363</i> at ¶¶ 34-35 (Dec. 2, 2003) (“UNSC Report”).
41	John Noth et al., National Commission on Terrorist Attacks Upon the United States, <i>Monograph on Terrorist Financing: Staff Report to the Commission</i> at 4 (2004) (“ <i>9/11 Commission Staff Monograph on Terrorist Financing</i> ”). <sup>2</sup>
42	<i>See, e.g., Matthew Levitt, Charitable Organizations and Terrorist Financing: A War on Terror Status-Check</i> , Wash. Inst. for Near East Policy (Mar. 19, 2004).
43	<i>9/11 Commission Report</i> at 55; <i>9/11 Commission Staff Monograph on Terrorist Financing</i> at 21. <sup>3</sup>
44	<i>See, e.g., Dore Gold, Hatred's Kingdom</i> at 76, 111 (2003) (“ <i>Hatred's Kingdom</i> ”).

<sup>1</sup> Though Plaintiffs refer to a State Department affirmation filed in proceedings before the United States Supreme Court, the quoted testimony appears in a much earlier declaration, cited here.

<sup>2</sup> The monograph itself is undated; however, it appears on the website of the 9/11 Commission, which “was frozen on September 20, 2004” (*see* <http://www.9-11commission.gov/>).

<sup>3</sup> The last sentence of this paragraph begins with “[t]o this day. . . .” The sources listed here relate only to the earlier allegations in this paragraph.

¶¶	Source/Description
45-46	<i>See, e.g., Federal Insurance v. Al Qaida</i> , First Amended Complaint ¶¶ 85, 114, 131, 151, 168, 181, 191, 208; <i>Hatred's Kingdom</i> at 101-02; The Netherlands Ministry of the Interior and Kingdom Relations, <i>From Dawa to Jihad: The Various Threats from Radical Islam to the Democratic Legal Order</i> at 7 (Dec. 2004).
47	<i>See, e.g.,</i> David B. Ottaway, <i>U.S. Eyes Money Trails of Saudi-backed Charities</i> , Wash. Post (Aug. 19, 2004); <i>UNSC Report</i> ¶¶ 34-66; <i>Hatred's Kingdom</i> at 214.
48-49	Summary allegations.
50	<i>See, e.g., Hatred's Kingdom</i> at 17-18.
51	<i>9/11 Commission Report</i> at 362.
52-57	<i>See, e.g., Hatred's Kingdom</i> at 17-21, 34-35.
58-59	<i>See, e.g., Hatred's Kingdom</i> at 47-52.
60-61	<i>See, e.g., Hatred's Kingdom</i> at 62-63, 77-78, 81.
62	Summary allegation.
63-65	<i>See, e.g., Hatred's Kingdom</i> at 84-87.
66-67	<i>See, e.g., Hatred's Kingdom</i> at 92-96, 100-07.
68	Summary allegation.
69-75	<i>See, e.g., Hatred's Kingdom</i> at 106-23.
76-79	<i>See, e.g., Hatred's Kingdom</i> at 96-99.
80-82	<i>See, e.g., Hatred's Kingdom</i> at 125-30, 244.
83	<i>See, e.g.,</i> BBC Worldwide Monitoring, <i>Police Officer Claims Bin-Ladin's Network in Philippines Remains Intact</i> (Sept. 20, 2001); Zachary Abuza, <i>Tentacles of Terror: Al Qaeda's Southeast Asian Network</i> , Contemporary Southeast Asia (Vol. 24, No. 3) at 439-40 (Dec. 2002); CNN, <i>Bin Laden's Brother-In-Law Speaks</i> (Nov. 24, 2004).
84-85	<i>See, e.g., Hatred's Kingdom</i> at 96-98.
86	<i>See, e.g.,</i> BBC News, <i>Who is Osama Bin Laden?</i> (Sept. 18, 2001).
87	Summary allegation.
89	<i>See, e.g.,</i> Peter L. Bergen, <i>Holy War, Inc.</i> at 76-77 (2001) ("Bergen, <i>Holy War</i> ").
90	Michael Scheuer, <i>Osama bin Laden</i> at 76-77 (2011), citing <i>The Arab Ansar in Afghanistan</i> (1988) and Bergen, <i>Holy War</i> at 14. <sup>4</sup>
91	Lawrence Wright, <i>The Looming Towers</i> at 150-51 (2006), citing a speech delivered by Osama bin Laden and filmed by Essam Deraz in April 1990. <sup>5</sup>

<sup>4</sup> According to Scheuer, the "script [of *The Arab Ansar in Afghanistan*] says the film was produced in 1988 . . . however, the documentary covers the battles around Jalalabad that began in March 1989." Scheuer appears to have obtained either the script or the film itself from the Islamic Muhajirun Network (a now-defunct extremist website) in 2006, but the date of its first release remains unclear. Michael Scheuer, *Osama bin Laden* at 204 (2011).

<sup>5</sup> Defendants were unable to verify directly the speech cited in this source.

¶¶	Source/Description
92	<i>See, e.g., The Guardian, The Making of the World's Most Wanted Man</i> (Oct. 27, 2001).
93	<i>See, e.g., Hatred's Kingdom</i> at 97-99, 129-31, 224, 266.
94-110	<i>See, e.g., Hatred's Kingdom</i> at 157-68; Joshua Teitelbaum, <i>Holier than Thou</i> at 17-47 (2000); Dilip Hiro, <i>War Without End</i> at 160 (2002). <sup>6</sup>
111	<i>See, e.g.,</i> Testimony of Steven Emerson and Jonathan Levin Before the U.S. Senate Committee on Governmental Affairs, <i>Terrorism Financing: Origination, Organization, and Prevention: Saudi Arabia, Terrorist Financing and the War on Terror</i> at 10-11 (July 31, 2003) ("Emerson & Levin Testimony").
112	James R. Midkiff, <i>Saudi Arabia: A Kingdom in Decline</i> at 49 (Naval Postgraduate School, Sept. 1995).
113	<i>See, e.g.,</i> Congressional Research Service, <i>Saudi Arabia: Current Issues and U.S. Relations</i> at CRS-12 (Apr. 3, 2003), <a href="http://www.iwar.org.uk/news-archive/crs/19494.pdf">http://www.iwar.org.uk/news-archive/crs/19494.pdf</a> .
114	<i>See, e.g.,</i> The Embassy of the Kingdom of Saudi Arabia News Release, <i>Kingdom Honors the Late Grand Mufti Sheikh bin Baz</i> (May 14, 1999), <a href="http://www.saudiembassy.net/archive/1999/news/page305.aspx">http://www.saudiembassy.net/archive/1999/news/page305.aspx</a> .
115	<i>See, e.g.,</i> Joseph A. Kechichian, <i>Succession in Saudi Arabia</i> at 166 (2001); James R. Midkiff, <i>Saudi Arabia: A Kingdom in Decline</i> at 49 (Naval Postgraduate School, Sept. 1995); Decl. of Abdulaziz H. Al Fahad ¶ 9 (dated Apr. 6, 2003) (filed as 03-MDL-1570 Dkt. No. 98, Exh. 2, Apr. 10, 2004).
116	<i>9/11 Commission Report</i> at 372; David B. Ottaway, <i>U.S. Eyes Money Trails of Saudi-Backed Charities</i> , Wash. Post (Aug. 19, 2004); Emerson & Levin Testimony at 34.
117	David B. Ottaway, <i>U.S. Eyes Money Trails of Saudi-Backed Charities</i> , Wash. Post (Aug. 19, 2004).
119-125	David B. Ottaway, <i>U.S. Eyes Money Trails of Saudi-Backed Charities</i> , Wash. Post (Aug. 19, 2004); <i>Hatred's Kingdom</i> at 151-52.

<sup>6</sup> These sources omit direct quotations from the Memorandum of Advice and the Letter of Demands (¶¶ 106, 108); however, they retain much of the substance of each document. For a translation of the Letter of Demands, *see* Human Rights Watch, *Empty Reforms* at 61-62 (May 1992). For a translation of the Memorandum of Advice, *see* R. Hrair Dekmejian, *Islam in Revolution: Fundamentalism in the Arab World* at 145 (1995).

¶¶	Source/Description
126	<i>See, e.g., UNSC Report ¶¶ 43, 46; Testimony of Steven Emerson Before the House Committee on Financial Services Subcommittee on Oversight and Investigations, Fund-Raising Methods and Procedures for International Terrorist Organizations at 4 (Feb. 12, 2002); National Review, Trails Lead to Saudis (May 21, 2003); U.S. Department of the Treasury News Release, Additional Al-Haramain Branches, Former Leader Designated by Treasury as Al Qaida Supporters (June 2, 2004); Anthony H. Cordesman, Saudi Arabia Enters the Twenty-First Century at 167-68 (2003); U.S. News and World Report, The Saudi Connection (Dec. 14, 2003); U.S. Department of Homeland Security, Terrorist Organization Reference Guide at 5-6 (Jan. 2004); Council on Foreign Relations, Pakistan's Jihad Culture (Dec. 2000), <a href="http://www.foreignaffairs.com/articles/56633/jessica-stern/pakistans-jihad-culture">http://www.foreignaffairs.com/articles/56633/jessica-stern/pakistans-jihad-culture</a>; Central Intelligence Agency, Untitled Report at 7-8 (1996) (filed as 03-MDL-1570 Dkt. No. 517, Exh. 1, Nov. 1, 2004) ("1996 CIA Report").</i>
127	<i>See, e.g., Hatred's Kingdom at 3-5.</i>
128-130	Summary allegations.
131-132	<i>See, e.g., 9/11 Commission Report at 148-49.</i>
133	<i>9/11 Commission Report at 147, 488.</i>
134-136	<i>See, e.g., 9/11 Commission Report at 147-49; Federal Insurance v. Al Qaida, First Amended Complaint ¶¶ 135-136; S. Rep. No. 107-351, H.R. Rep. No. 107-792, 107th Cong., 2d Sess. at 128, 192 (2002) ("Joint Inquiry Report").<sup>7</sup></i>
137	<i>9/11 Commission Report at 149, 155, 488.</i>
138-140	<i>Joint Inquiry Report at 131-32.</i>
141	<i>9/11 Commission Report at 156-57, 492.</i>
142-143	<i>9/11 Commission Report at 157, 181, 215, 225; Joint Inquiry Report at 132.</i>
144	<i>9/11 Commission Report at 158; CNN, The Quest for SE Asia's Islamic 'Super' State (Aug. 29, 2002).</i>
145-147	<i>9/11 Commission Report at 159, 215.</i>
148-151	Summary allegations.
152	Summary allegation; Michael Isikoff, <i>Failure To Communicate</i> , Newsweek (Aug. 3, 2003).
154-155	Bob Graham, <i>Intelligence Matters</i> at 11-12 (2004) (" <i>Intelligence Matters</i> ").

<sup>7</sup> The allegation that Khalifa's appointment was endorsed by Dr. Abdullah Omar Naseef (¶ 136) appears to arise from the latter's failure to deny the same allegation when it was made in 2012. At the time, Plaintiffs pointed to the Muslim World League's "status as IIRO's parent organization" to support this claim. It appears they did not draw a direct connection between Naseef and Khalifa. Appellants' Consolidated Reply Brief with Respect to Personal Jurisdiction at 103-04, *In Re: Terrorist Attacks on September 11, 2001*, Case No. 11-3294-cv(L) (2d Cir. filed June 25, 2012).

¶¶	Source/Description
156	Glenn R. Simpson, <i>List of Early al Qaeda Donors Points to Saudi Elite, Charities</i> , Wall St. J. (Mar. 18, 2003); Glenn R. Simpson, <i>Riyadh Paid Man Tied to Hijackers</i> , Wall St. J. (Aug. 8, 2003).
160	<i>See, e.g., Joint Inquiry Report</i> at 174; Michael Isikoff, <i>Failure To Communicate</i> , Newsweek (Aug. 3, 2003). <sup>8</sup>
161	<i>Joint Inquiry Report</i> at 172-73; Michael Isikoff, <i>Failure To Communicate</i> , Newsweek (Aug. 3, 2003); <i>9/11 Commission Report</i> at 217.
162	<i>Intelligence Matters</i> at 12-13.
164-166	<i>9/11 Commission Report</i> at 216-17, 514.
170	<i>9/11 Commission Report</i> at 515.
171	<i>Intelligence Matters</i> at 12.
173	<i>9/11 Commission Report</i> at 517.
175	<i>Joint Inquiry Report</i> at 173; <i>Intelligence Matters</i> at 18-19. <sup>9</sup>
179	<i>9/11 Commission Report</i> at 219.
180	Summary allegation.
181	<i>Joint Inquiry Report</i> at 174; <i>Intelligence Matters</i> at 24; Susan Gembrowski & Hala Ali Aryan, <i>Mosque Congregation Finds Itself Enmeshed in Inquiry</i> , San Diego Union-Tribune (Oct. 27, 2001).
182	Susan Gembrowski & Hala Ali Aryan, <i>Mosque Congregation Finds Itself Enmeshed in Inquiry</i> , San Diego Union-Tribune (Oct. 27, 2001).
183	<i>Joint Inquiry Report</i> at 174.
184	<i>Intelligence Matters</i> at 167. <sup>10</sup>
185	<i>Intelligence Matters</i> at 167; Glenn R. Simpson, <i>Riyadh Paid Man Tied to Hijackers</i> , Wall St. J. (Aug. 8, 2003).
186	<i>9/11 Commission Report</i> at 515.
187-188	<i>See, e.g., Joint Inquiry Report</i> at 174.
193	<i>See, e.g., Intelligence Matters</i> at 168; Michael Isikoff, <i>The Saudi Money Trail</i> , Newsweek (Dec. 1, 2002); Lucy Kosimar, Institute for Public Affairs, <i>Funding Terror: Investigating the Role of Saudi Banks</i> (Dec. 20, 2002). <sup>11</sup>

<sup>8</sup> These sources contain the substance of ¶ 160, but lack the following details: the source of the alleged complaint regarding a suspicious package, the allegations concerning wires beneath Al Bayoumi's bathroom sink, specific dates, and the FBI's 1995 probe relating to Al Bayoumi.

<sup>9</sup> This source mirrors the substance of this allegation, but does not disclose Al Bayoumi's specific address.

<sup>10</sup> The final sentence regarding the number of "ghost employees" allegedly carried on Dallah Avco's books does not appear in this source.



¶¶	Source/Description
194	Summary allegation.
196	Summary allegation.
197	<i>Joint Inquiry Report</i> at 176-177.
200-201	<i>Intelligence Matters</i> at 168; Lucy Kosimar, Institute for Public Affairs, <i>Funding Terror: Investigating the Role of Saudi Banks</i> (Dec. 20, 2002).
203	Michael Isikoff, <i>The Saudi Money Trail</i> , Newsweek (Dec. 1, 2002); Susan Schmidt & Mike Allen, <i>FBI Probes Donations from Saudi; Money From Envoy's Wife May Have Aided Hijackers</i> , Wash. Post (Nov. 24, 2002).
208	Summary allegation.
211-212	<i>9/11 Commission Report</i> at 517; <i>Joint Inquiry Report</i> at 179.
214	<i>Intelligence Matters</i> at 19.
215-216	<i>9/11 Commission Report</i> at 221, 229-30.
218	<i>9/11 Commission Report</i> at 221, 230.
219	<i>9/11 Commission Report</i> at 220, 516.
220	<i>Intelligence Matters</i> at 19; Wash. Times, <i>Princess's Cash Went to al Qaeda 'Advance Man'</i> (Nov. 26, 2002).
221	<i>9/11 Commission Report</i> at 222, 514; Greg Krikorian & H.G. Reza, <i>Southland's Link to 9/11 Still Murky</i> , L.A. Times (July 24, 2004). <sup>12</sup>
222-224	<i>9/11 Commission Report</i> at 218-19.
225	<i>9/11 Commission Report</i> at 220; <i>U.S. v. Abdoulah</i> , Case No. 01-CR-3240 (S.D. Cal.).
229	<i>9/11 Commission Report</i> at 220, 222-23; <i>Intelligence Matters</i> at 20.
231	Summary allegation.
236	Susan Schmidt, <i>Spreading Saudi Fundamentalism in U.S.</i> , Wash. Post (Oct. 2, 2003).
240	David Rennie, <i>Hijackers in Same Hotel as Saudi Minister</i> , The Telegraph (Oct. 3, 2003).
241-242	Summary allegations.
243	Memorandum of Law in Support of Motion to Dismiss of the Kingdom of Saudi Arabia at 5-6, <i>In Re: Terrorist Attacks on September 11, 2001</i> , Case No. 03-MDL-1570 (S.D.N.Y. filed Aug. 4, 2004).
246-247	Duplicates of ¶¶ 191-192.

<sup>11</sup> Plaintiffs refer to a declassified FBI report to support these allegations. The sources cited here yield similar information, but omit details regarding the exact number of alleged telephone calls, as well as the particular government offices to which they were allegedly directed.

<sup>12</sup> This source does not disclose the information concerning Los Angeles International Airport security footage alleged in the final sentence of this paragraph.



¶¶	Source/Description
248	Summary allegation.
252	Summary allegation.
253	<i>9/11 Commission Report</i> at 160, 433-38.
255-256	David Crawford, <i>How a Diplomat From Saudi Arabia Spread His Faith</i> , Wall St. J. (Sept. 10, 2003).
257	David Crawford, <i>How a Diplomat From Saudi Arabia Spread His Faith</i> , Wall St. J. (Sept. 10, 2003); David Crawford, <i>Germans Investigate Saudi Official</i> , Wall St. J. (Apr. 22, 2003); U.S. Department of the Treasury News Release, <i>Additional Al-Haramain Branches, Former Leader Designated by Treasury as Al Qaida Supporters</i> (June 2, 2004).
258	David Crawford, <i>Germans Investigate Saudi Official</i> , Wall St. J. (Apr. 22, 2003).
259	Stefan Thiel, <i>The Saudis: A Missing Diplomat?</i> , Newsweek (Apr. 13, 2003).
261	<i>Saudi Government: Bin Laden Loyalists</i> , Newsweek (May 4, 2003); Testimony of Matthew Levitt before the Senate Judiciary Subcommittee on Terrorism, Technology, and Homeland Security, <i>Subversion from Within: Saudi Funding of Islamic Extremist Groups Undermining U.S. Interests and the War on Terror from within the United States</i> (Sept. 10, 2003).
262	David Crawford & Ian Johnson, <i>Saudi Funds Tied to Extremism in Europe</i> , Wall St. J. (Dec. 30, 2003).
264	Summary allegation.
265-266	<i>Islamic Institute Closed, Searched</i> , Wash. Times (July 1, 2004).
267	Stephen Schwartz, FrontPageMag.com, <i>Saudi Extremism in High Places</i> , N.Y. Post (Feb. 11, 2004); <i>Islamic Institute Closed, Searched</i> , Wash. Times (July 1, 2004).
269	<i>Islamic Institute Closed, Searched</i> , Wash. Times (July 1, 2004); U.S. Senate Committee on Finance News Release, <i>Records Sought About Tax-exempt Organizations for Committee's Terror Finance Probe</i> (Jan. 14, 2004), <a href="http://www.finance.senate.gov/newsroom/chairman/release/?id=d74906d5-60ea-4761-b771-e6ddd7d9683f">http://www.finance.senate.gov/newsroom/chairman/release/?id=d74906d5-60ea-4761-b771-e6ddd7d9683f</a> .
270	Senator Charles E. Schumer News Release, <i>Yesterday's State Department Move To Revoke Visas Of Saudis Linked To Wahhabism Doesn't Go Far Enough</i> (Jan. 29, 2004).
271	<i>Islamic Institute Closed, Searched</i> , Wash. Times (July 1, 2004).
272	S. Con. Res. 131, 108th Cong. (2004); Senator Charles E. Schumer News Release, <i>Schumer, Collins Urge State Dept To Add Saudi Arabia To List Of Religiously Intolerant Nations</i> (Aug. 9, 2004).
273-274	AIVD, <i>Saudi Influences in the Netherlands</i> (Jan. 2004), <a href="http://www.investigativeproject.org/documents/testimony/61.pdf">http://www.investigativeproject.org/documents/testimony/61.pdf</a> .

¶¶	Source/Description
275	Beatrice de Graaf, <i>The Nexus Between Salafism and Jihadism in the Netherlands</i> (Mar. 3, 2010), citing two sources: NOVA, <i>De Omstreden El Tawheed-Moskee</i> (Nov. 9, 2004) (Video Broadcast); and Netherlands Ministers of the Interior and Justice, <i>Letter to Parliament</i> , Handelingen van de Tweede Kamer, No. 5319045 (Nov. 10, 2004). <sup>13</sup>
276	<i>See, e.g.</i> , Deutsche Welle, <i>Dutch Link to International Terrorism?</i> (Nov. 12, 2004); The Guardian, <i>Amsterdamed, Part One</i> (Dec. 4, 2004).
277-280	Ian Johnson & David Crawford, <i>A Saudi Group Spreads Extremism In ‘Law’ Seminars, Taught in Dutch</i> , Wall St. J. (Apr. 15, 2003).
284	<i>See, e.g.</i> , <i>9/11 Commission Report</i> at 371-74.
286-287	Summary allegations.
288	<i>See, e.g.</i> , <i>9/11 Commission Report</i> at 56; <i>Federal Insurance v. Al Qaida</i> , First Amended Complaint ¶ 76.
289	<i>See, e.g.</i> , <i>Hatred’s Kingdom</i> at 143-47.
290	<i>See, e.g.</i> , <i>Hatred’s Kingdom</i> at 238-39.
291	<i>See, e.g.</i> , Bergen, <i>Holy War</i> at 86; Evan F. Kohlmann, <i>Al-Qaida’s Jihad in Europe</i> at 16 (2004) (“ <i>Al-Qaida’s Jihad in Europe</i> ”).
292-293	Al-Sirat Al-Mustaqeem, <i>Interview with Sheikh al-Mujahideen Abu Abdel Aziz</i> (Aug. 1994) (translation by MSA News as of Dec. 2, 1995).
294	<i>See, e.g.</i> , Joshua Teitelbaum, <i>Holier than Thou</i> , at 49, 101-02 (2000).
295	Kingdom of Saudi Arabia, Portal of the General Presidency of Scholarly Research and Ifta’, <i>Fatwas of Ibn Baz – Help the Muslims in Bosnia and Herzegovina with money and weapons</i> , <a href="http://www.alifta.net/fatawa/fatawaDetails.aspx?language=en&amp;BookID=14&amp;View=Page&amp;PageNo=1&amp;PageID=3557">http://www.alifta.net/fatawa/fatawaDetails.aspx?language=en&amp;BookID=14&amp;View=Page&amp;PageNo=1&amp;PageID=3557</a> (citing comments published in Al-Sharq Al-Awsat no. 6095 dated 10/3/1416 A.H. (Aug. 6, 1995)).
296-297	<i>See, e.g.</i> , Decl. of Saud bin Mohammad Al-Roshood ¶ 5 (dated Apr. 27, 2004) (filed as 03-MDL-1570 Dkt. No. 472, Exh. 7, Oct. 1, 2004); <i>Hatred’s Kingdom</i> at 143-47; Written Testimony of Jean-Charles Brisard Before the Senate Committee on Banking, Housing, and Urban Affairs at 19 (Oct. 22, 2003) (“Brisard Testimony”).
298	<i>See, e.g.</i> , <i>Hatred’s Kingdom</i> at 143-47; Terms of Agreement Regarding UNHCR Vehicles (Dec. 23, 1996) (filed as 03-MDL-1570 Dkt. No. 141, Exh. B, Att. 7, May 10, 2004).
299	Summary allegation.

<sup>13</sup> This paragraph mirrors De Graaf’s language. De Graaf in turn relies on a Dutch media report and legislative records dated in 2004. Defendants verified these primary sources as public.

¶¶	Source/Description
300	<i>See, e.g., 9/11 Commission Report</i> at 58; Christine Herrera, <i>Bin Laden Funds Abu Sayyaf Through Muslim Relief Group</i> , Philippine Daily Inquirer (Aug. 9, 2000); Paul Oquist, UN Development Programme, <i>Mindanao and Beyond: Competing Policies, Protracted Conflict, and Human Security</i> at 4, 17 (Sept. 23, 2002).
301	<i>See, e.g., Robert Day McAmis, Malay Muslims</i> at 98 (2002); Mozammel Haque, <i>Filipino Muslims' Struggle for Independence and the Manila-Mindanao Peace Pact</i> , Pakistan Horizon (Vol. 49, No. 4) at 57 (Oct. 1996).
302	<i>See, e.g., Hatred's Kingdom</i> at 119, 190-91, 213-14.
303	<i>See, e.g., Christine Herrera, Bin Laden Funds Abu Sayyaf Through Muslim Relief Group</i> , Philippine Daily Inquirer (Aug. 9, 2000); Dr. Zachary Abuza, ABC (Australia), <i>Tentacles of Terror: Al Qaeda's Southeast Asian Network</i> , <a href="http://www.abc.net.au/4corners/stories/s711740.htm">www.abc.net.au/4corners/stories/s711740.htm</a> . <sup>14</sup>
308	<i>See, e.g., Federal Insurance v. Al Qaida</i> , First Amended Complaint ¶ 136; <i>Joint Inquiry Report</i> at 128, 192; <i>9/11 Commission Report</i> at 147.
309	Summary allegation.
310	<i>See, e.g., BBC News, Kosovo Assault 'Was Not Genocide'</i> (Sept. 7, 2001), <a href="http://news.bbc.co.uk/2/hi/europe/1530781.stm">http://news.bbc.co.uk/2/hi/europe/1530781.stm</a> .
311	<i>See, e.g., Executive Intelligence Review, U.S. Protects Al-Qaeda Terrorists In Kosovo</i> (Vol. 28, No. 42) (Nov. 2, 2001).
312	<i>See, e.g. Federal Insurance v. Al Qaida</i> , First Amended Complaint ¶¶ 117, 125.
314	The Netherlands Ministry of the Interior and Kingdom Relations, <i>From Dawa to Jihad: The Various Threats from Radical Islam to the Democratic Legal Order</i> at 7 (Dec. 2004).
315	1996 CIA Report at 8; U.S. Department of the Treasury News Release, <i>Additional Al-Haramain Branches, Former Leader Designated by Treasury as Al Qaida Supporters</i> (June 2, 2004).
317	Summary allegation.
332	Summary allegation.
333	<i>Federal Insurance v. Al Qaida</i> , First Amended Complaint ¶ 113.
334-335	Summary allegations.
336	Decl. of Ali Muhammad al-Kamal at 2 (dated Apr. 2, 2003) (filed as D.D.C. No. 02-CV-1616 Dkt. No. 110, Exh. 3, Apr. 7, 2003).
337	Decl. of Abdulaziz H. Al Fahad ¶ 8 (dated Apr. 6, 2003) (filed as 03-MDL-1570 Dkt. No. 472, Exh. 8, Oct. 1, 2004).

<sup>14</sup> This source is undated, but contains anticipatory statements regarding events that occurred in March 2003.

¶¶	Source/Description
338	Decl. of Abdullah bin Saleh Al-Obaid ¶ 5 (dated Mar. 29, 2004) (filed as 03-MDL-1570 Dkt. No. 98, Exh. 1, Apr. 10, 2004).
339	<i>Muslim World League Journal</i> (1984). <sup>15</sup>
340	Testimony of Matthew Epstein with Evan Kohlmann Before the House Committee on Financial Services Subcommittee on Oversight and Investigations, <i>Arabian Gulf Financial Sponsorship of Al-Qaida via U.S.-Based Banks, Corporations and Charities</i> at 5 (Mar. 11, 2003) (“Epstein & Kohlmann Testimony”).
341	Defendant Muslim World League’s Answer to First Amended Complaint at 66, <i>In Re: Terrorist Attacks on September 11, 2001</i> , Case No. 03-MDL-1570 (filed July 30, 2004).
343	<i>Federal Insurance v. Al Qaida</i> , First Amended Complaint ¶ 118.
344	Government’s Evidentiary Proffer at 29-34, <i>U.S. v. Arnaout</i> , No. 02-CR-892 (N.D. Ill. filed Jan. 6, 2003).
346	Emerson & Levin Testimony at 17-18.
347	<i>See, e.g.,</i> Masaki Kobayashi, <i>The Islamist Movement in Sudan: the Impact of Dr. Hassal al-Turabi’s Personality on the Movement</i> at 103 (Durham University, Oct. 10, 1997); Complaint ¶¶ 207, 225, <i>York v. Al Qaeda</i> , Case No. 03-CV-5493 (S.D.N.Y. filed July 24, 2003).
348	Affidavit of Evan F. Kohlmann ¶ 20 (dated Oct. 18, 2004) (filed as 03-MDL-1570 Dkt. No. 1030, Att. A, July 7, 2005). <sup>16</sup>
349	Complaint ¶ 386, <i>World Trade Center Properties v. Al Baraka Inv. and Dev. Corp.</i> , Case No. 04-CV-7280 (S.D.N.Y. filed Sept. 10, 2004).
350	<i>See, e.g.,</i> Zachary Abuza, <i>Tentacles of Terror: Al Qaeda’s Southeast Asian Network</i> , <i>Contemporary Southeast Asia</i> (Vol. 24, No. 3) at 436, 452 (Dec. 2002). <sup>17</sup>
354	<i>See, e.g.,</i> <i>Al-Qaida’s Jihad in Europe</i> at 42.
355-356	<i>Al Alam Al Islami</i> (eds. Apr. 17, 1992, Apr. 20, 1992, Aug. 10, 1992, Apr. 19, 1993). <sup>18</sup>
358-359	Statement by Dr. Abdullah Omar Naseef (May 1993); Press Conference by Dr. Abdullah Omar Naseef (Apr. 1993). <sup>19</sup>
360	<i>Al Alam Al Islami</i> (ed. Mar. 23, 1992). <sup>20</sup>

<sup>15</sup> Defendants were unable to verify this source, but Plaintiffs refer to this specific edition of the *Muslim World League Journal*, a broadly disseminated publication.

<sup>16</sup> Although this affidavit was filed in 2005, Plaintiffs necessarily had access to it as of the date it was taken.

<sup>17</sup> *See supra* note 7.

<sup>18</sup> Defendants were unable to verify these sources, but Plaintiffs cite these specific editions of *Al Alam Al Islami*, a broadly disseminated publication.

<sup>19</sup> Defendants were unable to verify these sources.

¶¶	Source/Description
362	<i>See, e.g., Federal Insurance v. Al Qaida</i> , First Amended Complaint ¶ 122.
363	Third Amended Consolidated Master Complaint ¶ 308, <i>Ashton v. Al Qaeda</i> , Case No. 02-CV-6977 (S.D.N.Y. filed Sept. 5, 2003).
365	<i>See, e.g., Third Amended Consolidated Master Complaint ¶ 484, Ashton v. Al Qaeda</i> , Case No. 02-CV-6977 (S.D.N.Y. filed Sept. 5, 2003).
366	Brisard Testimony at 8.
367	Jean-Charles Brisard, <i>Terrorism Financing: Roots and Trends of Saudi Terrorism Financing</i> at 17-19 (Dec. 19, 2002) (filed as 03-MDL-1570 Dkt. No. 156, Exh. 11, May 14, 2004).
368	<i>The Muslim World Magazine</i> (July 21-27, 1997). <sup>21</sup>
370	Summary allegation.
371-372	<i>Federal Insurance v. Al Qaida</i> , First Amended Complaint ¶¶ 130-131.
373	Decl. of Saleh Abdullah Al Saykhan ¶ 2 (dated Mar. 31, 2003) (filed as D.D.C. No. 02-CV-1616 Dkt. No. 110, Exh. 2, Apr. 7, 2003).
375	<i>See, e.g. Federal Insurance v. Al Qaida</i> , First Amended Complaint ¶¶ 117, 125; <i>Hatred's Kingdom</i> at 125-30, 244.
376	Summary allegation.
379	Summary allegation.
380	<i>See, e.g., Zachary Abuza, Al Qaeda in Southeast Asia: Exploring the Linkages</i> ¶ 3, Institute of Defense and Strategic Studies (Mar. 7, 2003); Zachary Abuza, <i>Tentacles of Terror: Al Qaeda's Southeast Asian Network</i> , Contemporary Southeast Asia (Vol. 24, No. 3) at 440 (Dec. 2002).
381	U.S. Department of State, <i>Patterns of Global Terrorism – 2002</i> , at 101-02 (Apr. 2003); U.S. Department of State, <i>Comprehensive List of Terrorists and Groups Identified Under Executive Order 13224</i> (Dec. 31, 2001), <a href="http://2001-2009.state.gov/s/ct/rls/fs/2001/6531.htm">http://2001-2009.state.gov/s/ct/rls/fs/2001/6531.htm</a> .
382	Affidavit of Robert Walker in Support of Complaint ¶ 29 (dated Apr. 29, 2002), <i>U.S. v. Benevolence Int'l</i> , No. 02-CR-0414 (N.D. Ill. filed Apr. 29, 2002); 1996 CIA Report at 8.
384	Duplicate of ¶¶ 353, 382.
396	Duplicate of ¶ 304.
407	Emerson & Levin Testimony at 19.
409-411	Epstein & Kohlmann Testimony at 5-6; <i>Al-Qaida's Jihad in Europe</i> at 42.

<sup>20</sup> See *supra* note 18.

<sup>21</sup> Defendants were unable to verify this source, but Plaintiffs refer to this specific edition of the *Muslim World Magazine*, a broadly disseminated publication.

¶¶	Source/Description
412	<i>See, e.g., Al-Qaida's Jihad in Europe</i> at 108-09; John Schindler, <i>Unholy Terror</i> at 144 (2007) (citing <i>The Guardian</i> (June 16, 1994), <i>Radio BH</i> (Jan. 31, 1994); <i>Slobodna Bosna</i> (Dec. 12, 1998), and <i>Dani</i> (Mar. 8, 2002)); <sup>22</sup> <i>Al-Qaida's Jihad in Europe</i> at 109.
415-416	1996 CIA Report at 6-8.
417	<i>See, e.g., 9/11 Commission Report</i> at 58; 1996 CIA Report at 12-13; <i>German Internal Intelligence Service Summary of Findings (English Translation)</i> (filed as 03-MDL-1570 Dkt. No. 277, Exh. 7, June 30, 2004); John Pomfret, <i>Bosnia's Muslims Dodged Embargo</i> , <i>Wash. Post</i> (Sept. 22, 1996). <sup>23</sup>
419	Prepared Statement of Mr. Matthew A. Levitt before the Senate Subcommittee on International Trade and Finance at III (Aug. 1, 2002).
420	<i>Pakistan Deports 89 Aid Workers</i> , <i>USA Today</i> (Oct. 6, 2001).
421-423	Emerson & Levin Testimony at 20-21.
424-425	<i>Federal Insurance v. Al Qaida</i> , First Amended Complaint ¶¶ 146-147.
439	<i>See, e.g., Federal Insurance v. Al Qaida</i> , First Amended Complaint ¶¶ 150-151; RICO Statement Applicable to World Assembly of Muslim Youth, Exh. A at 7-8, <i>In Re: Terrorist Attacks on September 11, 2001</i> , Case No. 03-MDL-1570 (filed Dec. 29, 2004).
440	Emerson & Levin Testimony at 31-34; The Federal Plaintiffs' Memorandum of Law in Opposition to the Motion to Dismiss of the Kingdom of Saudi Arabia at 14, <i>In Re: Terrorist Attacks on September 11, 2001</i> , Case No. 03-MDL-1570 (filed Oct. 1, 2004).
441	Decl. of Mutaz Saleh Abu Unuq ¶ 2 (dated Apr. 1, 2003) (filed as D.D.C. No. 02-CV-1616 Dkt. No. 110, Exh. 4, Apr. 7, 2003).
442	Epstein & Kohlmann Testimony at 5; Testimony of Matthew Epstein Before the Senate Judiciary Committee Subcommittee on Terrorism, <i>Technology, and Homeland Security, Saudi Support for Islamic Extremism in the United States</i> at 19-20 (Sept. 10, 2003).
445	Statement of Steven Emerson to the National Commission on Terrorist Attacks Upon the United States (July 9, 2003), <a href="http://govinfo.library.unt.edu/911/hearings/hearing3/witness_emerson.htm">http://govinfo.library.unt.edu/911/hearings/hearing3/witness_emerson.htm</a> .

<sup>22</sup> Schindler cites various Balkan media reports, including a Bosnian radio broadcast. Defendants were unable to verify these sources.

<sup>23</sup> These sources do not disclose that the TWRA and the IIRO shared office space in Vienna.



¶¶	Source/Description
446	Written Statement of James B. Jacobsen, President of Christian Solidarity International, Submitted to the Subcommittee of International Relations and Human Rights of the House Committee on International Relations, <i>Hearing on Persecution of Christians Worldwide</i> (Feb. 15, 1996); Epstein & Kohlmann Testimony at 16-17. <sup>24</sup>
447	RICO Statement Applicable to World Assembly of Muslim Youth, Exh. A at 7-10, <i>In Re: Terrorist Attacks on September 11, 2001</i> , Case No. 03-MDL-1570 (filed Dec. 29, 2004).
448	Summary allegation.
449-450	Chris Hedges, <i>Muslims From Afar Joining 'Holy War' in Bosnia</i> , N.Y. Times (Dec. 5, 1992); U.S. Department of the Treasury News Release, <i>U.S. Treasury Designates Two Individuals with Ties to al Qaida, UBL Former BIF Leader and al-Qaida Associate Named Under E.O. 13224</i> (Dec. 21, 2004), <a href="http://www.treasury.gov/press-center/press-releases/Pages/js2164.aspx">http://www.treasury.gov/press-center/press-releases/Pages/js2164.aspx</a> .
451	ITAR-TASS, <i>Chechen Separatists Said Funded by Several Foreign Sources</i> (May 19, 2000). <sup>25</sup>
452	Department of Defense Intelligence Report at 3 (Oct. 16, 1998), <a href="http://stagenic.judicialwatch.org/wp-content/uploads/2013/07/C_102_dia.pdf">http://stagenic.judicialwatch.org/wp-content/uploads/2013/07/C_102_dia.pdf</a> (declassified Nov. 16, 2004).
453	NBC, <i>U.S. Links bin Laden to Chechnya</i> (Aug. 21, 1999). <sup>26</sup>
454	Al Jazeera, <i>The Chechen Tragedy – The Reality and the Required Role</i> (Jan. 15, 2000). <sup>27</sup>
455	<i>See, e.g.</i> , The Guardian, <i>Frankenstein the CIA Created</i> (Jan. 17, 1999); Scripps Howard News Service, <i>Osama Bin Laden: Still Lurking but Often Thwarted</i> (Aug. 3, 1999).
456	Australian General News, <i>Philippines Suspect Australian Group of Helping Rebels</i> (Jan. 15, 1999); <sup>28</sup> U.S. Department of State, <i>Patterns of Global Terrorism – 1999</i> (Apr. 2000).

<sup>24</sup> The testimony of Evan Kohlmann and Matthew Epstein only quotes a portion of the statements quoted in the complaint.

<sup>25</sup> Defendants were unable to verify this source, though Plaintiffs refer to it specifically.

<sup>26</sup> Defendants were unable to verify this source, though Plaintiffs refer to it specifically.

<sup>27</sup> Defendants were unable to verify this source, though Plaintiffs refer to it specifically.

<sup>28</sup> Defendants were unable to verify this source, though Plaintiffs refer to it specifically.



¶¶	Source/Description
457	Money Clips, <i>Kashmiri Leader Thanks WAMY for Help</i> (Dec. 8, 1995); India Today, <i>SIMI: Nursery of Hate</i> (Apr. 2, 2001); Economic Times of India, <i>ISI Twin Plan – Attack Christians, Defame Hindu Outfits</i> (July 15, 2000); BBC Worldwide Monitoring, <i>Kashmir: Hizb-Ul-Mojahedin Chief Explains Reasons Behind Cease Fire</i> (Aug. 23, 2000); The Statesmen (India), <i>Pakistani Behind Church Blast Say Police</i> (July 14, 2000). <sup>29</sup>
458	See, e.g., Congressional Research Service, <i>Terrorism in South Asia</i> at CRS-5, CRS-10 (Aug. 9, 2004), <a href="http://fpc.state.gov/documents/organization/35167.pdf">http://fpc.state.gov/documents/organization/35167.pdf</a> .
459	Speech delivered by WAMY Secretary General Maneh al Johani (1991). <sup>30</sup>
460	Associated Press, <i>Pakistan Questions Sudan Man About Tape</i> (Dec. 9, 2002); <i>Pakistan Departs 89 Aid Workers</i> , USA Today (Oct. 6, 2001); Rawalpindi Jang, <i>Pak's North-West Frontier Province Government Seeks Deportation of NGO's Arab Workers</i> (Oct. 3, 2001).
461	Emerson & Levin Testimony at 38.
462	<i>Federal Insurance v. Al Qaida</i> , First Amended Complaint ¶ 160. <sup>31</sup>
464	The Statesman (India), <i>Ex-PSC official held for routing funds to Geelani</i> (June 12, 2002).
465	Global News Wire, <i>Intelligence Service "Alert" Watches Egypt's "Muslim Brothers" in Romania</i> (Sept. 5, 2003). <sup>32</sup>
470	U.S. Department of the Treasury News Release, <i>Treasury Designates Benevolence International Foundation and Related Entities as Financiers of Terrorism</i> (Nov. 19, 2002), <a href="http://www.treasury.gov/press-center/press-releases/Pages/po3632.aspx">http://www.treasury.gov/press-center/press-releases/Pages/po3632.aspx</a> .
476-477	<i>Federal Insurance v. Al Qaida</i> , First Amended Complaint ¶¶ 167-168.
478	Affidavit of Khalid Bin Obaid Azzahri ¶ 3 (dated Apr. 7, 2004) (filed as 03-MDL-1570 Dkt. No. 472, Exh. 11, Oct. 1, 2004); Emerson & Levin Testimony at 30-31; <i>Federal Insurance v. Al Qaida</i> , First Amended Complaint ¶ 169.
479	9/11 Commission Staff Monograph on Terrorism Financing at 115.
480	Summary allegation.
482	Glenn R. Simpson & Rick Wartzman, <i>U.S. Probes Saudi Conglomerate For Links to Islamic Militants</i> , Wall St. J. (Nov. 1, 2001); Sharon LaFraniere, <i>How Jihad Made Its Way to Chechnya</i> , Moscow Times (Apr. 28, 2003), <a href="http://www.themoscowtimes.com/news/article/tmt/238795.html">http://www.themoscowtimes.com/news/article/tmt/238795.html</a> .

<sup>29</sup> Defendants were unable to verify these sources, though Plaintiffs refer to them specifically.

<sup>30</sup> Defendants were unable to verify this source.

<sup>31</sup> This source does not disclose information regarding Abdullah bin Laden's Saudi Embassy connections conveyed by the last sentence of this paragraph.

<sup>32</sup> Defendants were unable to verify this source, though Plaintiffs refer to it specifically.

¶¶	Source/Description
483	U.S. Department of the Treasury, <i>Additional Background Information on Charities Designated Under Executive Order 13224</i> , at 5, 7-8, <a href="http://www.treasury.gov/resource-center/terrorist-illicit-finance/Documents/designationsum-.pdf">http://www.treasury.gov/resource-center/terrorist-illicit-finance/Documents/designationsum-.pdf</a> . <sup>33</sup>
484-487	U.S. Department of the Treasury News Release, <i>Treasury Announces Joint Action with Saudi Arabia Against Four Branches of Al-Haramain In The Fight Against Terrorist Financing</i> (Jan. 22, 2004), <a href="http://www.treasury.gov/press-center/press-releases/Pages/js1108.aspx">http://www.treasury.gov/press-center/press-releases/Pages/js1108.aspx</a> .
488-490	U.S. Department of the Treasury News Release, <i>Additional Al-Haramain Branches, Former Leader Designated by Treasury as Al Qaida Supporters; Treasury Marks Latest Action in Joint Designation with Saudi Arabia</i> (June 2, 2004), <a href="http://www.treasury.gov/press-center/press-releases/Pages/js1703.aspx">http://www.treasury.gov/press-center/press-releases/Pages/js1703.aspx</a> .
492-493	U.S. Department of the Treasury News Release, <i>U.S.-Based Branch of Al Haramain Foundation Linked to Terror; Treasury Designates U.S. Branch, Director</i> (Sept. 9, 2004), <a href="http://www.treasury.gov/press-center/press-releases/Pages/js1895.aspx">http://www.treasury.gov/press-center/press-releases/Pages/js1895.aspx</a> ; Al Haramain Islamic Foundation Inc., <i>IRS 2001 Form 990</i> , at 4.
494	Complaint ¶ 71, <i>Cantor Fitzgerald v. Akida Bank Pvt. Ltd.</i> , No. 04-CV-7065 (S.D.N.Y. filed Sept. 2, 2004).
495-500	Affidavit of Colleen Anderson in Support of an Application for Search Warrant ¶¶ 5, 11, 20, 29-34, 36, 42-44, 60-61, <i>In re: 3800 S. Highway 99, Ashland, OR 97520</i> (filed as 03-MDL-1570 Dkt. No. 472, Exh. 13, Oct. 1, 2004).
502	U.S. Department of the Treasury News Release, <i>U.S.-Based Branch of Al Haramain Foundation Linked to Terror; Treasury Designates U.S. Branch, Director</i> (Sept. 9, 2004), <a href="http://www.treasury.gov/press-center/press-releases/Pages/js1895.aspx">http://www.treasury.gov/press-center/press-releases/Pages/js1895.aspx</a> ; Transcript of Trial Proceedings, <i>U.S. v. Bin Laden</i> , Case No. 98-CR-1023 (S.D.N.Y. May 2, 2001); U.S. Department of the Treasury News Release, <i>Treasury Announces Joint Action with Saudi Arabia Against Four Branches of Al-Haramain In The Fight Against Terrorist Financing</i> (Jan. 22, 2004), <a href="http://www.treasury.gov/press-center/press-releases/Pages/js1108.aspx">http://www.treasury.gov/press-center/press-releases/Pages/js1108.aspx</a> .
504	David Crawford, <i>How a Diplomat From Saudi Arabia Spread His Faith</i> , Wall St. J. (Sept. 10, 2003).
505	<i>Federal Insurance v. Al Qaida</i> , First Amended Complaint ¶¶ 167, 176.
506	RICO Statement Applicable to Perouz Seda Ghaty a/k/a “Pete Seda” and Al Haramain Islamic Foundation at 8, <i>In Re: Terrorist Attacks on September 11, 2001</i> , Case No. 03-MDL-1570 (filed Nov. 1, 2004).
507	1996 CIA Report at 5.
508	Summary allegation.

<sup>33</sup> Plaintiffs quote a U.S. Department of the Treasury Designation Summary for al Haramain, which is undated. The designation was announced on March 11, 2002.

¶¶	Source/Description
519	<i>See, e.g.,</i> Complaint ¶¶ 392, 404, <i>Keating v. Al Baraka Inv. &amp; Dev. Corp.</i> , Case No. 03-CV-3859 (E.D.N.Y. filed Aug. 6, 2003).
520	<i>Federal Insurance v. Al Qaida</i> , First Amended Complaint ¶ 181.
521	Decl. of Dr. Mutlib bin Abdullah Al-Nafissa ¶ 3 (dated Jan. 31, 2004) (filed as 03-MDL-1570 Dkt. No. 262, Exh. C, June 25, 2004).
522	Decl. of Saud bin Mohammad Al-Roshood ¶¶ 6-8 (dated Feb. 17, 2004) (filed as 03-MDL-1570 Dkt. No. 262, Exh. A, June 25, 2004).
523	<i>See, e.g.,</i> Complaint ¶¶ 392, 395, <i>Keating v. Al Baraka Inv. &amp; Dev. Corp.</i> , Case No. 03-CV-3859 (E.D.N.Y. filed Aug. 6, 2003).
524	<i>Federal Insurance v. Al Qaida</i> , First Amended Complaint ¶ 183.
528	Summary allegation.
531	Emerson & Levin Testimony at 17; The Centre for Peace in the Balkans, <i>The More Things Change . . .</i> (Mar. 2002), <a href="http://www.balkanpeace.org/index.php?index=/content/analysis/a12.incl">http://www.balkanpeace.org/index.php?index=/content/analysis/a12.incl</a> .
533	<i>U.S. Eyes Saudi File on Terror Targets</i> , Wash. Times (Feb. 25, 2002).
534	Brisard Testimony at 8; Complaint ¶ 454, <i>Barrera v. Al Qaeda</i> , No. 03-CV-7036 (S.D.N.Y. filed Sept. 10, 2003).
535	<i>U.S. Eyes Saudi File on Terror Targets</i> , Wash. Times (Feb. 25, 2002).
536	Summary allegation; <i>U.S. Eyes Saudi File on Terror Targets</i> , Wash. Times (Feb. 25, 2002).
539	Andrew Purvis, <i>The Suspects: A Bosnian Subplot</i> , Time (Nov. 12, 2001).
542	Department of Defense Intelligence Agency Report (declassified as of Apr. 2, 1997), <a href="http://fas.org/asmp/resources/FOIA/DIASomaliaApril97AideedReceives.pdf">http://fas.org/asmp/resources/FOIA/DIASomaliaApril97AideedReceives.pdf</a> (For declassification date, <i>see</i> Letter from Robert P. Richardson, Chief, Freedom of Information Act Staff, Defense Intelligence Agency, to Paul F. Pineo (Apr. 2, 1997), <a href="http://fas.org/asmp/resources/FOIA/DIASomaliaApril97cover.pdf">http://fas.org/asmp/resources/FOIA/DIASomaliaApril97cover.pdf</a> .)
543-544	<i>Federal Insurance v. Al Qaida</i> , First Amended Complaint ¶¶ 190-191.
546-547	<i>Federal Insurance v. Al Qaida</i> , First Amended Complaint ¶ 193; James Rupert, <i>Dreams of Martyrdom Draw Islamic Arabs to Join Afghan Revels</i> , Wash. Post (July 21, 1986).
548-549	Plaintiffs' Memorandum of Law in Opposition to Motions to Dismiss of Defendant Saudi Arabian Red Crescent Society at 6-7, <i>In Re: Terrorist Attacks on September 11, 2001</i> , Case No. 03-MDI-1570 (filed June 30, 2004).
550	<i>Federal Insurance v. Al Qaida</i> , First Amended Complaint ¶ 196.

¶¶	Source/Description
551	<i>See, e.g.,</i> Nick Wood, <i>US Fears Terrorist Attack in Kosovo</i> , BBC News (Apr. 3, 2000); U.S. Department of the Treasury News Release, <i>Treasury Department Statement on the Designation of Wa'el Hamza Julidan</i> (Sept. 6, 2002); <i>Federal Insurance v. Al Qaida</i> , First Amended Complaint ¶¶ 125, 193.
552	Nick Wood, <i>US Fears Terrorist Attack in Kosovo</i> , BBC News (Apr. 3, 2000).
553	Ismail Khan, <i>Pakistan: Two Sudanese Held in Egyptian Embassy Blast Case</i> , The News (Islamabad) (Feb. 1, 1996); Ed Blanche, <i>Ayman Al-Zawahiri: Attention Turns to the Other Prime Suspect</i> , Jane's Intelligence Review (Oct. 3, 2001).
554	Rawalpindi Jang, <i>Pak's North-West Frontier Province Government Seeks Deportation of NGO's Arab Workers</i> (Oct. 3, 2001); ONASA, <i>ONASA Carries Biographies of Six Algerians Handed Over to US Officials</i> (Jan. 18, 2002).
555	Summary allegation.
559	<i>Federal Insurance v. Al Qaida</i> , First Amended Complaint ¶ 203; Reply Memorandum in Support of Consolidated Motion to Dismiss of Prince Naif bin Abdulaziz Al-Saud at 4, Case No. 03-MDL-1570 (S.D.N.Y. filed Aug. 27, 2004).
561	<i>Federal Insurance v. Al Qaida</i> , First Amended Complaint ¶ 204.
562	U.S. Department of the Treasury, <i>Additional Background Information on Charities Designated Under Executive Order 13224</i> , at 3, <a href="http://www.treasury.gov/resource-center/terrorist-illicit-finance/Documents/designationsum-.pdf">http://www.treasury.gov/resource-center/terrorist-illicit-finance/Documents/designationsum-.pdf</a> . <sup>34</sup>
563	Summary allegation.
564	U.S. Department of the Treasury News Release, <i>Treasury Department Statement on the Designation of Wa'el Hamza Julidan</i> (Sept. 6, 2002), <a href="http://www.treasury.gov/press-center/press-releases/Pages/po3397.aspx">http://www.treasury.gov/press-center/press-releases/Pages/po3397.aspx</a> .
565	Brisard Testimony at 8.
566-567	Nick Wood, <i>US Fears Terrorist Attack in Kosovo</i> , BBC News (Apr. 3, 2000).
568	Brisard Testimony at 8.
569	Nick Wood, <i>US Fears Terrorist Attack in Kosovo</i> , BBC News (Apr. 3, 2000).
570	<i>UNSC Report</i> ¶ 51.
572	<i>Federal Insurance v. Al Qaida</i> , First Amended Complaint ¶ 290.
573	Plaintiffs' Memorandum of Law in Opposition to Motion to Dismiss of Defendant the National Commercial Bank at 49-50, <i>Burnett v. Al Baraka Inv. &amp; Dev. Corp.</i> , Case No. 02-CV-1616 (D.D.C. filed Dec. 22, 2003).
575-576	<i>Federal Insurance v. Al Qaida</i> , First Amended Complaint ¶ 208.
577	Summary allegation.

<sup>34</sup> Plaintiffs quote a U.S. Department of the Treasury Designation Summary for al Haramain, which is undated. The designation was announced on May 6, 2004.

¶¶	Source/Description
578-579	<i>Federal Insurance v. Al Qaida</i> , First Amended Complaint ¶¶ 212-213; Mutlak Al-Baqami & Saqar Al-Amry, <i>US Lawsuit 'Worthless and Ineffective'</i> , Arab News (Aug. 19, 2002), <a href="http://www.arabnews.com/node/223483?quicktabs_stat2=1">http://www.arabnews.com/node/223483?quicktabs_stat2=1</a> . <sup>35</sup>
580	U.S. Department of the Treasury, <i>Additional Background Information on Charities Designated Under Executive Order 13224</i> , at 19, <a href="http://www.treasury.gov/resource-center/terrorist-illicit-finance/Documents/designationsum-.pdf">http://www.treasury.gov/resource-center/terrorist-illicit-finance/Documents/designationsum-.pdf</a> . <sup>36</sup>
581-583	Summary allegations.
584	<i>See, e.g.</i> , U.S. Department of Justice, <i>Report of the Attorney General to the Congress of the United States on the Administration of the Foreign Agents Registration Act of 1938</i> , at 253 (Nov. 9, 1999).
585-586	Brisard Testimony at 19-20.

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<sup>35</sup> These sources do not include Plaintiffs' allegations concerning Adnan Basha's dual role (¶ 579).

<sup>36</sup> Plaintiffs quote a U.S. Department of the Treasury Designation Summary for al Haramain, which is undated. The designation was announced on September 6, 2002.